

**THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

Michael Louis Vickers, et al,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO: 2:24-cv-00169
	§	
Joseph R. Biden, Jr., et al.,	§	
	§	
Defendants.	§	

**DEFENDANTS' UNOPPOSED MOTION
FOR EXTENSION OF THEIR DEADLINE
TO RESPOND TO THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendants respectfully move the Court for a 30-day extension of time to answer or otherwise respond to the complaint, which would extend the response deadline from October 15, 2024, to November 14, 2024. Plaintiffs do not oppose this extension request.

Plaintiffs filed their complaint, which challenges a number of Defendants' immigration initiatives pursuant to the Take Care Clause of the U.S. Constitution, the Administrative Procedures Act, and the National Environmental Policy Act, on July 31, 2024. ECF No. 1. The United States Attorney's Office was served with the Complaint on August 13, 2024. Defendants have 60 days to answer or respond. Fed. R. Civ. P. 12(a)(2). Sixty days after August 13, 2024, is October 12, 2024, which falls on a weekend, and the next day that is not a weekend or legal holiday is October 15, 2024. Fed. R. Civ. P. 6(a)(2)(C). Defendants' requested 30-day extension would place their deadline to answer or otherwise respond to the Complaint on November 14, 2024.

The Complaint challenges several of Defendants' immigration initiatives. Defendants require additional time to look into these claims and confer with their clients on the most

appropriate way to respond to them. Defendants' counsel discussed this motion and its basis with Plaintiffs' counsel via email on September 17, 2024, and Plaintiffs' counsel indicated that Plaintiffs do not oppose the motion.

Accordingly, Defendants respectfully request the Court extend their deadline to answer or otherwise respond to the Complaint by 30 days, until November 14, 2024.

Dated: September 20, 2024

Respectfully submitted,

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Principal Deputy Assistant Attorney General

WILLIAM C. PEACHEY

Director

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/s/ Joseph A. Darrow

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Counsel for Defendants

CERTIFICATE OF SERVICE

I, Joseph A. Darrow, do hereby certify that on September 20, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Joseph A. Darrow
JOSEPH A. DARROW
U.S. Department of Justice